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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

JUL 6 1995

95-PCA-342

Mr. Daniel Silver
Assistant Director
Waste Management Division
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Silver:

IDENTIFICATION OF NON-PERMITTED TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITIES AND RELATED POTENTIAL ENVIRONMENTAL NON-COMPLIANT CONDITIONS AT THE HANFORD SITE

This letter provides information responsive to your letter of May 1, 1995. Mr. Mike Wilson of your staff has met with the U.S. Department of Energy, Richland Operations Office (RL) on two occasions in an effort to ensure that RL and its contractors developed an adequate response to your letter. Specifically your letter requested from RL "identification of all known non-permitted TSD facilities at the Hanford Site."

The principal RL affected contractors, Westinghouse Hanford Company, Bechtel Hanford, Inc., and Pacific Northwest Laboratories, have identified such conditions at facilities operated by each respective contractor. RL has compiled the information into the enclosed tables and reviewed a draft with Mr. Wilson and other members of his staff in May 1995. Enclosed is the information based on those discussions.

Exhibits 1 and 2 consist of potentially non-permitted TSDs, those activities within a permitted TSD that are occurring or being performed in a potentially noncompliant manner, and potential environmental noncompliances. We believe that several of the items identified as potentially non-permitted TSDs or noncompliances may be subject to interpretation about whether there are actual noncompliances, while others involve conflicts between regulations.

Please note that the majority of the issues identified in Exhibit 2 are not new. Many of these conditions have been discussed and worked on by our staffs for several years. Unfortunately, they have not been completely resolved

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and/or the necessary documentation to close these items has not been developed and exchanged.

Once you and your staff have had the opportunity to evaluate this submittal, RL and its contractors will initiate development of preliminary plans and schedules for prioritizing and resolving the regulatory issues associated with each item. I would suggest that our staffs work together to finalize an acceptable approach to resolving the regulatory issues associated with the action plans.

If you have any questions, please contact me or your staff may contact Mr. Jim Rasmussen or Mr. Felix Miera of my staff at (509) 373-7589.

Sincerely,

John D. Wagoner
Manager

EAP:FRM

Enclosure

cc w/encl:
K. C. Brog, PNL
W. T. Dixon, WHC
D. Lundstrom, Ecology
W. J. Madia, PNL
J. F. Nemec, BHI
D. R. Sherwood, EPA
A. L. Trego, WHC
M. A. Wilson, Ecology
R. H. Wyer, BHI

Exhibit II
SUMMARY OF POTENTIAL NONCOMPLIANT ENVIRONMENTAL CONDITIONS

CONDITION NAME	DESCRIPTION, LOCATION, QUANTITY, AND/OR RADIOLOGICAL CONDITION	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S)	DOCUMENTATION TO/FROM REGULATORS
CROSSCUTTING			
Miscellaneous Listed Waste Issues *RL Program(s):* *TWRS* *Waste Management* *Facility Transition* *Env. Restoration*	1. Active tank systems which contained listed waste at one time, but which have undergone decontamination: • 300 Area Waste Acid Treatment System • B Plant • PUREX 2. Part A, Form 3 permit applications (for some TSD units) may not reflect all applicable listed waste codes: • 222-S Laboratory (Tanks) • DSTs • 242-A Evaporator • LERF • PUREX (multiple, including 216-A-10 Crib) • B-Plant Containment Building • 207-A South Retention Basins • T Plant • 200 Area ETF 3. Inactive unpermitted land disposal units may have received listed waste discharges: • TWRS (216-A-45 Crib) Process condensate from PUREX concentrators was discharged to the 216-A-45 crib. Listed waste, along with plutonium and uranium, were transfered from the laboratory to the process where they entered the concentrator and the listed waste went into the process condensate stream going to the crib. Discharge to the crib ceased in 1989. • TWRS (216-B-55 Crib) Steam condensate from operation of the cell 23 concentrator was discharged to the 216-B-55 Crib. Due to a crosstie with the process condensate, contamination was carried over to the steam condensate. The crosstie was eliminated in 1988, and over 500,000 gallons of flush water processed through to decontaminate the system. Discharge to the crib was ceased prior to 1990. • TWRS (216-B-62 Crib) The waste stream to the 216-B-62 Crib was the process condensate from the cell 23 concentrator. Listed waste issues with the low level waste stream from the processing of SST waste constitute the application of the F001-F005 waste codes. Discharge to the crib was ceased in January 1987.	1. WAC 173-303-070 Reach agreement on decontamination 2. WAC 173-303-800(2); WAC 173-303-805(6) Application of the mixture rule 3. WAC 173-303-800(2); WAC 173-303-646(2)(a)	1. Letter, J. D. Bauer, RL, to D. B. Jansen, Ecology, 9302175, "Designation of the B Plant Low Level Waste Stream as a Non-Listed Waste with Regard to Spent Halogenated Solvents - F001," dated 3/23/93. Letter, J. E. Rasmussen & J. E. Mecca, RL, to R. F. Stanley, Ecology, and D. R. Sherwood, EPA, "Resolution of Permitting and Interim Status Compliance related Issues Associated with Transition of the Plutonium-Uranium Extraction (PUREX) Facility," 94-PPO-035, dated 10/28/94. 2. Off-Normal Occurrence Report RL-WHC-GENERAL-1994-0020, "RCRA Listed Waste Code Inconsistencies," dated 12/30/94. Letter, M. A. Wilson, Ecology, to J.E. Rasmussen, RL, "Listed Wastes from Hanford Laboratories," dated 3/7/95. 3. No formal documentation. †

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S):	DOCUMENTATION TO INFORM REGULATORS:
Contaminated Equipment *RL Program(s):* *TWRS* *Waste Management* *Facility Transition* *Env. Restoration* *Technical Management*	Equipment that has contacted dangerous waste is stored at the Hanford Site. Waste equipment that has contacted listed waste or exhibits a characteristic must be managed in accordance with the WAC. This condition impacts potentially all facilities (e.g., 309 Building, TWRS, TRUSAF, Transition Facilities). Equipment has been grouped into three principle categories: • Waste Equipment e.g. Various TWRS probable mixed waste-- a) A pump was buried at the SE corner of SX farm outside the fence in the 1960s. Knowledge gained from staff interviews but unverified by documentation. Presumed to be highly radioactive; b) Two large pieces of equipment, either condensors or chillers, were buried north of SX farm outside the fence in the 1950s. Contamination area/underground radioactive materials. • Equipment that is inaccessible or installed • Reusable Equipment e.g. Various B Plant process vessels were placed in standdown when Cs and Sr processing was ceased in 1984. To place the equipment in standdown, the equipment was decontaminated with multiple chemical and/or water flushes, and emptied as low as achievable. This was done to ensure inventories of Cs and Sr were recovered. Since being placed in standdown prior to November 1987, no additional mixed or otherwise hazardous waste has been managed in the process equipment. Therefore the equipment, when identified for discard, will be designated based on the characteristics of the entire waste matrix.	WAC 173-303-800; WAC 173-303-016; WAC 173-303-630; WAC 173-303-400(3)(a)(ii) Management strategy developed with regulators; concurrence expected 6/95. Waste sites will be entered in WIDS.	Letter, R. D. Izatt, RL, and R. E. Lerch, WHC, to T. L. Nord, "Solid Waste", dated 4/25/90. Letter, J. D. Bauer, RL, to P. T. Day, EPA, & D. B. Jansen, Ecology, "Management of Equipment that has come in contact with Hazardous, Dangerous, or Mixed Waste," dated 2/19/93. Letter, J. D. Bauer, RL, to D. R. Sherwood, EPA and D. C. Nylander, Ecology, "Management of Equipment that has come in Contact with Dangerous Waste," dated 3/2/94. Letter, J. D. Bauer, RL, to R. F. Stanley, Ecology, and G. C. Hofer, EPA, "High Activity Radioactive Waste Issues at Hanford," dated 4/30/93.
Contaminated Environmental Media *RL Program(s):* *TWRS* *Waste Management* *Facility Transition*	Contaminated soil excavated on the Hanford Site could be misdesignated and, therefore, improperly managed particularly where listed waste is involved.	WAC 173-303-070 Management strategy being developed with regulators.	Letter, J. D. Bauer, RL, to D. R. Sherwood, EPA, and J. Stohr, Ecology, "Hanford Site Policy for Management of Contaminated Soil," dated 1/20/94.
Dangerous Waste Tank System Requirements *RL Program(s):* *TWRS* *Waste Management* *Facility Transition* *Env. Restoration* *Technical Management*	Most of Hanford's facilities only partially meet the dangerous waste tank system requirements. See enumerated discussion below.	40 CFR 265.191-195; WAC 173-303-640(2)-(6)	Letter, R. D. Freeberg, RL, to P. T. Day, EPA, and R. F. Stanley, Ecology, 8904211, "Proposed Petitions for Rulemaking Changes (Milestone M-22-01)," dated September 29, 1989. Presentation to Ecology, "Hanford Facility 300 Area Liquid Effluent Systems and RCRA Permitting Needs," 9/16/94. Signed M-32-00 Unit Managers' Meeting Minutes, 10/7/94. Letter, W. T. Dixon, WHC, and J. E. Rasmussen, RL, to S. M. Alexander, Ecology, and D. R. Sherwood, EPA, 95-PCA-252, "340 Complex Compliance with the Resource Conservation and Recovery Act," dated 3/28/95.

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENTS:	DOCUMENTATION TO/FROM REGULATORS:
Dangerous Waste Tank System Requirements (cont.)	1. Daily visual inspections of aboveground tank systems. Radiation exposure to workers restricts access into process cells, vaults, diversion boxes, etc. which prevents personnel from performing daily visual inspections at all facilities where radiation exposure would be higher than ALARA. Affected facilities: • 219-S • T Plant • TWRS • B Plant • 340 Tank System • PFP • PUREX † • 324 • 325	42 USC 2011 (AEA); 40 CFR 265.195(a); WAC 173-303-640(6)(4)(f)	The Tank Farms & Burial Grounds Env. Status as of 3/25/88 & the Hanford Self-Assessment Rpt. (SST) were submitted to EPA & Ecology on 1/25/89. "Identification of RCRA/AEA Inspection and Labeling Inconsistencies," dated May 1989. Letter, R. D. Freeberg, RL, to P. T. Day, EPA, and R. F. Stanley, Ecology, "Proposed Petitions for Rulemaking Changes (Milestone M-22-01) 8904211, dated 9/89. Letter, Ron Izatt to Roger Stanley, "Dangerous Waste Compliance Plan for the 300 Area," 9001031, dated 3/6/90. Letter, S. H. Wisness (RL) to T. L. Nord (Ecology), "Petition for Equivalency for PUREX Secondary Containment," dated 7/9/91. TPA M-32-00 Milestone, approved January 1994. The following correspondence was hand delivered to Ecology in June 1994 and during the 10/7/94 M-32 Unit Manager Meeting. Letter, E. C. Vogt (WHC) to J. E. Mecca (RL), 9454284, "Proposed Compliance Strategy for the Plutonium Finishing Plant Interim Status Dangerous Waste Storage and Treatment Tank System (Target Milestone M-32-01-T02)," dated 6/22/94.
Dangerous Waste Tank System Requirements (cont.)	2. Annual integrity test of tank systems without compliant secondary containment. Obstacles to performing annual integrity tests vary from lack of piping isolating mechanisms, inability to assess test results (i.e., lack of leak detection on buried single-wall piping), waste generation, and potential damage caused by tests to aging piping systems. The 219-S tank system complies with annual integrity test requirements. Affected Facilities (see Part As for affected units): • PFP • T Plant • TWRS • B Plant • 340 Tank System • PUREX † • 324 • 325	40 CFR 265.193(i); WAC 173-303-640(4)(i)	TPA M-32-00 Milestone, approved January 1994.

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S):	DOCUMENTATION TO/FROM REGULATORS:
Dangerous Waste Tank System Requirements (cont.)	3. **Secondary containment and leak detection.** Most facilities do not meet secondary containment and leak detection requirements for tanks and ancillary equipment (including transfer lines). Except for B Plant, the 340 Facility, and TWRS (in areas not covered by M-43, such as units to be shut-down in the next five or so years), most facilities have committed to upgrade projects or have worked out agreements with the regulators. B Plant has a M-32 action to complete its integrity assessment and then address tank system deficiencies. The 340 Facility is currently looking for ways to address this deficiency. TWRS is currently in negotiation meetings with Ecology to address containment issues on units not covered by M-43. Affected Facilities: • T Plant • TWRS • B Plant • PFP • 340 • PUREX † • 219-S • 324 • 325 • 326 • 327	40 CFR 265.193; WAC 173-303-640(4)	The Tank Farms & Burial Grounds Env. Status as of 3/25/88 & the Hanford Self-Assessment Rpt. (SST) were submitted to EPA & Ecology on 1/25/89. Letter, S. H. Wiseman, RL, to D. R. Sherwood, EPA, and R. F. Stanley, Ecology, 93-OPB-25, "Westinghouse Hanford Company Federal Facility Agreement and Consent Order Target M-32-01-T01, Complete and Submit Integrity Assessment Report for Plutonium Finishing Plant Interim Status Tank System," dated 12/14/93. Letter, P. W. Wilkeson, RL, to J. Stohr, Ecology, and D. R. Sherwood, EPA, 94-TOP-068, "Completion of Tri-Party Agreement M-32-05-T01," dated 5/6/94.
Dangerous Waste Tank System Requirements (cont.)	4. **Integrity assessments and reports.** The 340 Facility and TWRS (except for the 242-A Evaporator) lack a written integrity assessment. The 340 Facility also lacks a schedule for future assessments. Other facilities have either fulfilled or have committed to completing their integrity assessments (TPA milestone M-32).	40 CFR 265.191-192; WAC 173-303-640(2)&(3)	TPA M-32-00 Milestone, approved January 1994. Letter, R. D. Izatt, RL, and R. E. Lerch, WHC, to T. L. Nord, Ecology, 90-PPB-025, "Dangerous Waste Tank Integrity Assessment Report for 219-S Tanks," dated 7/3/90.
Dangerous Waste Tank System Requirements (cont.)	5. **Major risk labeling** Due to worker radiation exposure, major risk labeling of mixed waste tanks is not performed. Access controls are in place. Affected Facilities: • 219-S • T Plant • TWRS • B Plant • 340 Tank System • PFP • PUREX † • 324 • 325	42 USC 2011 (AEA); WAC 173-303-400(3)(a)(iii); WAC 173-303-640(5)(d)	The Tank Farms & Burial Grounds Env. Status as of 3/25/88 and the Hanford Env. Self-Assess. Rpt. (SST), dated 4/26/89 were submitted to RL on 12/29/88. "Identification of RCRA/AEA Inspection and Labeling Inconsistencies," dated May 1989. Letter, R. D. Freeberg, RL, to F. T. Day, EPA, and R. F. Stanley, Ecology, "Proposed Petitions for Rulemaking Changes (Milestone M-22-01), 8904211, 9/89.
Dangerous Waste Tank System Requirements (cont.)	6. **Secondary containment, leak detection, integrity assessments, daily inspections, and spill and overflow prevention.** These activities/systems are not performed/in place at: • 241-CX Tank System • Hexone Tanks	40 CFR 265, Subpart J Ecology has designated specific actions for CX Tanks. Hexone Tanks are unfit for use and therefore undergoing closure consistent with compliance order (TPA).	Letter D.L. Lundstrom, Ecology, to J.D. Bauer, RL, "Tank 241-CX-72 at the Strontium Semiworks," dated 7/7/94.

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENTS:	DOCUMENTATION TO/FROM REGULATORS:
Interim Status Closures *RL Program(s):* *TWRS* *Waste Management* *Facility Transition* *Technical Management*	TSD units that do not meet interim status standards, or cannot meet final status standards, are to be closed with the schedules for submittal of closure plans contained in TPA Milestone M-20. TSD units undergoing closure may not be in compliance with all interim status requirements. Example of noncompliant areas are: contingency plans, waste analysis plans, operating training plans, location of operating records. These TSD units include: • 105-DR Sodium Fire Facility • 1706-KE Treatment and Storage Facility • 200 West Ash Pit • 2101-M Pond • 2727-S Storage Facility • 300 Area Solvent Evaporator • 304 Concretion Facility • E-8 Borrow Pit • Hanford Patrol Academy Demolition Site • Simulated High Level Waste Slurry Treatment/Storage	40 CFR 265; WAC 173-303-400	Discussed during the original negotiations of the TPA, during the review process for each TSD unit closure plan, and during the Hanford RCRA Permit negotiations.
High Activity Filters >90-day Storage *RL Program(s):* *Facility Transition*	Highly radioactive HEPA filters at B-Plant and deep bed fiber-glass filters at PUREX have been tested using dioctyl pthalate (DOP - a state only carcinogen) and may be contaminated with regulated levels of DOP. The filters have been left in place after their useful life and are inaccessible due to high radiation. The filters are located in underground vaults at B-Plant (291-B) and PUREX to provide radiation shielding to protect workers. Sampling has not been performed to confirm the quantity of DOP present on the filters and the PUREX filters are still on line.	WAC-173-303-800(2)	Letter, J. D. Bauer, RL, to R. F. Stanley, Ecology, and G. C. Hofer, EPA, 9303943, "High Activity Radioactive Waste Issues at Hanford," dated 5/21/93.
Incomplete Inventory of Non-Radioactive Air Emissions *RL Program(s):* *TWRS* *Waste Management* *Facility Transition* *Technical Management*	For the past several years, WHC has compiled the Annual Compliance Report, "Nonradiological Emissions Inventory for the Hanford Site." The recent air emissions inventory supporting the air operating permit application shown that some emission points were not reported. Such emission points include, but are not limited to: • 100N N-1517N 018 • H-200E002 001 • N-2101M 001 • N-2101M 002 • N-2715EC 003 • N-272E 001 • H-200W007 001 • H-200W004 001 • N-231Z 001 (2 pollutants) • N-4722C 002	WAC 173-400-105	J. D. Bauer, RL, to D. A. Lauer, (Annual Inventory Report to Benton County Clean Air Authority for each calendar year since 1989) "Nonradiological Emission Inventory Information for the Hanford Site during Calendar Year 1992."
Interim Status Expansion Approval *RL Program(s):* *TWRS* *Waste Management* *Facility Transition*	Required Ecology approval has not been obtained for Hanford Facility Dangerous Waste Part A Permit Application, Form 3 revisions that were submitted addressing increases in the design capacity of processes used at the Hanford Facility. These include: • Liquid Effluent Retention Facility, rev. 0 • 200 Area Effluent Treatment Facility, rev. 1 • Central Waste Complex, rev. 3 • 222-S Laboratory Complex, rev. 1 • 241-Z Treatment and Storage Tanks, rev. 3 • DST, Multifunctional Waste Tanks, rev. 6 • 242-A Evaporator, rev. 6 • Waste Receiving and Processing, rev. 0 • Sodium Storage Facility and Sodium Reaction Facility, rev. 0 • Low-level Burial Grounds • PUREX, rev. 5	WAC 173-303-805(7)(a)(ii) Need Ecology concurrence on interim status expansion of these units.	Letter, J. D. Bauer, RL, to R. F. Stanley, Ecology, 9303927 (RL No. 93-RPS-178), "Documentation of Approval for Hanford Facility Interim Status Expansions," dated 5/15/93. Letter, M. N. Jarayai, Ecology, to J. E. Rasmussen, RL and W. T. Dixon, WHC, "Ecology Approval of Part A, Form 3," dated 6/14/95. [Sodium]

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENTS:	DOCUMENTATION TO/FROM REGULATORS:
Sodium Storage *RL Program(s):* *TWRS* *Waste Management*	Due to changing missions, stored sodium product may be declared waste, due to lack of use. Sodium is being stored in drums, tanks, and test loops at various facilities across the Hanford Site. Some of the sodium has been sold, some is being held for TWRS possible future use, and the rest is being offered for sale to vendors. Sodium in drums have been transferred to RCRA equivalent storage units, but large tanks and test loops have no secondary containment. The list of these facilities is contained in the "Hanford Site Sodium Management Plan."	WAC 173-303-016 & -800(2)	Ecology has received a report, produced by FFTF, on all sodium at Hanford: "Hanford Site Sodium Management Plan," WHC-SD-FF-MP-001. Letter, J. E. Mecca to D. C. Nylander, "Hanford Site Management Presentation," dated 5/93. DOE/EA-0987, Environmental Assessment, "Disposition of Alkali Metal Test Loops, Hanford Site, Richland, WA," dated 5/95. DOE/EA-0993, Environmental Assessment, "Shutdown of Fast Flux Test Facility, Hanford Site, Richland, WA," dated 5/95.
Unpermitted Landfills *RL Program(s):* *TWRS* *Facility Transition* *Env. Restoration*	1. The Central Landfill does not have an operating permit. 2. Uncontrolled dumping has occurred. A variety of materials has been placed at various sites and could be solid wastes and possibly dangerous wastes.	1. WAC 173-304-600 2. WAC 173-303; WAC 173-304	1. A meeting was held with Ecology. At the meeting, Ecology stated that RL can continue interim operation of the landfill if a target shutdown date is submitted and approved. RL has developed a plan for shutdown by March 31, 1996. RL's shutdown plan also asks for Ecology's approval to operate the landfill without lining additional trenches. Letter, J. E. Rasmussen, RL, to D. L. Lundstrom, Ecology, "Hanford Site Solid Waste Landfill," dated 5/10/95. 2. Inspection # 200W FY95.
Petroleum Underground Storage Tanks Financial Responsibility Requirements *RL Program(s):* *TWRS* *Waste Management* *Facility Transition*	DOE contractors at Hanford have not met regulatory demonstration of financial responsibility for taking corrective action or for compensating third parties for bodily injury and property damage caused by accidental releases. The exemption for federal entities has been read to mean that DOE already meets the financial requirements and, as only one person is required to demonstrate financial responsibility, that is sufficient to meet the intent of the regulations.	WAC 173-360 Part IV	No formal documentation.
FACILITY-SPECIFIC			
B PLANT Labeling and Visual Inspection of Container Storage Area *RL Program(s):* *Facility Transition*	Labeling to identify major risk required for dangerous waste cell 4 container storage area (high radiation levels). Also, weekly visual inspections are not performed.	WAC 173-303-630(3); WAC 173-303-320(2)	Packets submitted in accordance with M-22-01, "Submit Petitions or Requests for Variance from Interim Status Standards to Ecology or EPA." Letter, R. D. Freeburg, RL, to R. F. Stanley, Ecology, and P. Day, EPA, "Proposed Petitions for Rulemaking Changes (Milestone M-22-01)," dated 9/29/89.
340 FACILITY Waste Movement From Permitted Facility to <90 Day Tank System *RL Program(s):* *Waste Management*	The 340 dangerous waste tank system is operated as a less than 90-day accumulation system, yet some wastes are received from upstream interim status units.	WAC 173-303-141 & -800(2)	PNL Compliance Letter, D. D. Dorsey, Ecology, to J. J. Sutey, RL, "Dangerous Waste Compliance Inspection," dated August 5, 1994. Presentation to Ecology, "Hanford Facility 300 Area Liquid Effluent Systems and RCRA Permitting Needs," given September 16, 1994. Letter, J. E. Rasmussen, RL, and W. T. Dixon, WHC, to S. M. Alexander, Ecology, and D. R. Sherwood, EPA, "340 Complex Compliance With Resource Conservation and Recovery Act (RCRA)," 95-PCA-252, dated March 28, 1995.

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S):	DOCUMENTATION TO/FROM REGULATORS:
TWRS Secondary containment for the DST system cannot be pumped within 24 hours. *RL Program(s):* *TWRS*	Waste from leaking tanks and precipitation accumulated in secondary containment and ancillary equipment for the DST system cannot generally be pumped in 24 hours. RCRA requires the operator of a TSD facility to remove liquids in secondary containment within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.	40 CFR 265.196	The Tank Farms and Burial Grounds Environmental Status as of March 25, 1988 and the Hanford Environmental Self-Assessment Report (Single-Shell Tanks), were submitted to EPA and Ecology on January 25, 1989. Hanford Site Dangerous Waste Tank System Compliance Evaluation, transmitted to EPA and Ecology in February 1990. Tank Farms Environmental Compliance Matrix Report, informally transmitted to E. J. Sensi, RL, dated November 9, 1993, and informally transmitted by Mr. Sensi to Ecology in November 1993. Occurrence Report RL-WHC-TANK FARMS-1995-0031, Potential Environmental Regulatory Deficiency: Failure to Remove Liquids From Secondary Containment (Catch Tanks) In A Timely Manner.
TWRS Waste in tank secondary containment systems *RL Program(s):* *TWRS*	Liquids have accumulated in the tank farm waste transfer system catch tanks for longer than 90 days. These catch tanks serve as the secondary containment system along the transfer routes. RCRA requires the operator of a TSD facility to remove liquids in secondary containment within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment. Liquids have accumulated in some catch tanks for many years. The presence of wastes in the secondary containment systems is directly related to the fact that the systems cannot be pumped within 24 hours.	40 CFR 265.196(b)(2); WAC-173-303-400(3)(c)(viii)	First reported in WHC-EP-0182-26, Tank Farm Surveillance and Waste Status Summary Report for May 1990." The current revision is WHC-EP-0812-081 (December 1994). All revisions since the original (Rev. 26) have included updated information. This is a monthly report with a broad distribution including RL and the Regulators. DOE/RL-90-39, REV. 0, Double Shell Tank System Dangerous Waste Part B Permit Application (06/91). Occurrence Report RL-WHC-TANK FARMS-1995-0031, Potential Environmental Regulatory Deficiency: Failure to Remove Liquids From Secondary Containment (Catch Tanks) In A Timely Manner.

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S):	DOCUMENTATION TO/FROM REGULATORS:
TWRS Single-Shell Tank Systems do not comply with most of the dangerous waste regulations. *RL Program(s):* *TWRS*	The Single-Shell Tank System (SSTs) does not comply with most of the applicable interim status tank standards. No integrity assessments have been performed for the SSTs. The SSTs do not have adequate secondary containment. The SSTs do not have adequate leak detection. Some of the SSTs may be leaking. Leaking SSTs cannot be pumped within 24-hours and cannot be repaired. There is no approved closure plan for the SSTs, and closure has not been completed within 180 days of last waste receipt into the SSTs.	Chapter 173-303 WAC Hanford Federal Facility Agreement and Consent Order (TPA) Milestone M-45 acknowledged that dangerous waste tank system upgrades to ancillary equipment previously identified as RCRA past practice units would not be mandated and identifies activities necessary for the closure of all Single-Shell Tank Farms. TPA Milestone M-41 establishes a schedule for interim stabilization of the SSTs. TPA Milestone M-23, which has been completed, established interim status corrective actions. Unit Managers Meeting (UMM) minutes for March 22, 1995, which were approved by EPA and Ecology, acknowledge that daily liquid level monitoring cannot be performed, that SSTs cannot be pumped within 24 hours if leaking, and cannot be repaired. The limited scope of these milestones, along with the UMM minutes, constitute acknowledgement by Ecology and EPA that dangerous waste tank system requirements over and beyond current activities to meet WAC 173-303 are not feasible. Activities associated with Milestone M-45 involve establishing schedules for the development of retrieval technology, preparation of a closure plan, retrieval of waste in the SSTs, and closure of the SSTs. Activities associated with Milestone M-23 involved a Waste Analysis Plan, Contingency Plan, Inspection Plan, Maintenance of Inspection Operating Record, Training Plan, and Fire Inspection Requirement determination.	The Tank Farms and Burial Grounds Environmental Status as of March 25, 1988 and the Hanford Environmental Self-Assessment Report (Single-Shell Tanks), were submitted to EPA and Ecology on January 25, 1989. Hanford Site Dangerous Waste Tank System Compliance Evaluation, transmitted to the U.S. Environmental Protection Agency and Ecology in February, 1990. Tank Farms Environmental Compliance Matrix Report, dated November 9, 1993, informally transmitted to Mr. E. J. Senat, RL, in 1993 and informally transmitted by Mr. Senat to Ecology in November, 1993.
TWRS Recordkeeping *RL Program(s):* *TWRS*	Records required to document compliance with environmental regulatory requirements may not be readily retrievable and may not be retained for the required periods.	40 CFR 61.95; WAC 173-303-380; WAC 246-247-080	The Tank Farms and Burial Grounds Environmental Status as of March 25, 1988 and the Hanford Environmental Self-Assessment Report (Single-Shell Tanks), and Final Draft Resource Conservation and Recover Act interim status Assessment of thirteen facilities, WHC-EP-0257 (1989), were submitted to EPA and Ecology on January 25, 1989. Tank Farms Environmental Compliance Matrix Report, informally transmitted to E. J. Senat, RL, dated November 9, 1993, and informally transmitted by Mr. Senat to Ecology in November 1993.
TWRS Lack of Waste Analysis Plan (WAP) at 600 Area Purgewater Storage Tanks *RL Program(s):* *TWRS*	The 600 Area Purgewater Storage Tanks do not have a WAP in place. This is a requirement for RCRA interim status TSDs.	WAC 173-303-300 Develop a WAP.	No formal documentation

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENTS:	DOCUMENTATION TO/FROM REGULATORS:
TWRS Project W-314 Deferral *RL Program(s):* *TWRS*	A milestone commitment date revision was requested. Ecology has denied the request. The upgrades provided by this project are essential to bringing TWRS Plant ventilation, transfer, and operating systems to be used during retrieval into regulatory compliance.	40 CFR 61, Subpart H; WAC-173-303-400	Documented in SST/DST Unit Managers Meeting minutes beginning in October 1994 and signed by WHC, RL, EPA, and Ecology. Letter, R. G. Holt, RL, to D. R. Sherwood, EPA, and R. F. Stanley, Ecology, "Project W-314, Tank Farm Restoration and Safe Operations (TFRSO), Milestone Slippage," dated October 30, 1994.
TWRS 200-E/200-W Tank Farms Inspection Schedules not complete/ implemented *RL Program(s):* *TWRS*	200 East Area Tank Farms has an inspection schedule, but the inspection program has not yet been fully implemented. A draft of the 200 West Area Tank Farms inspection schedule has been issued for review. Inspections are being performed at these facilities, but required documentation may not be available until the inspection schedules are fully implemented.	WAC 173-303-320; WAC 173-303-380	The Tank Farms and Burial Grounds Environmental Status as of March 25, 1988, and the Hanford Environmental Self-Assessment Report (Single-Shell Tanks), were submitted to EPA and Ecology on January 25, 1989. Tank Farms Environmental Compliance Matrix Report, informally transmitted by E. J. Senat, RL to Ecology in November 1993. Verbal discussions during Ecology inspections of the 242-A Evaporator facility. WHC letter #9354703, R. D. Gustavson to R. E. Gerton, informally transmitted to Ecology by E. J. Senat, RL.
TWRS Lead Management Plan *RL Program(s):* *TWRS*	Lead is used at TWRS Plant facilities for shielding, and is also stored in anticipation of future shielding needs. Without a lead management plan, it cannot be verified that the lead shielding is still necessary and that the lead in storage still has a forecasted need. Lead not necessary for shielding may be subject to regulation as a hazardous waste.	WAC 173-303-016; WAC 173-303-017 Implement a lead management plan.	No formal documentation
Site wells out of compliance with current construction requirements *RL Program(s):* *Waste Management* *Env. Restoration*	Evidence indicates that some wells installed in past years are allowing communication between aquifers as well as providing pathways for contamination to move into and between aquifers. Two such wells are currently documented: W15-5 and W15-6. In addition, some wells do not meet Washington State Minimum Standards as set forth in WAC-173-160-085.	40 CFR 264, Subpart F; 40 CFR 265, Subpart F Requirements for Resource Protection Monitoring Wells	Agreements and discussions held by WHC and Ecology. April 6, 1995 Meeting Minutes validated by Ecology. Annual Report for RCRA Groundwater Monitoring Projects at Hanford Site Facilities for 1990; 1991; 1992; 1993; 1994.
Improperly capped out-of-service wells *RL Program(s):* *Waste Management* *Env. Restoration*	Some of the out-of-service wells are not properly capped in the manner set forth in WAC-173-160-085.	40 CFR 264, Subpart F; 40 CFR 265, Subpart F Requirements for Resource Protection Monitoring Wells	Agreements and discussions held by WHC and Ecology. April 6, 1995 Meeting Minutes validated by Ecology. Annual Report for RCRA Groundwater Monitoring Projects at Hanford Site Facilities for 1990; 1991; 1992; 1993; 1994.
Treatment by Generator (TBG) Compliance Issues *RL Program(s):* *Technical Management*	Subsequent to the issuance of revisions to TIM 86-3 by Ecology, Hanford has not filed a revised Form 2 with Ecology. This has resulted in a potential issue with the ongoing TBG activities in the Laboratory. The revised Form 2 was certified by RL on May 25 and has been transmitted to Ecology and EPA.	WAC 173-303; TIM 86-3 (revised 1993)	Letter, J. E. Rasmussen, RL, W. T. Dixon, WHC, K. L. Brog, PNL, and T. E. Logan, BHI to K. Silva, Ecology, 95PCA312, dated May 25, 1995.
Fuel Pools as USTs *RL Program(s):* *Technical Management*	Fuel storage basins in the 327 Building may qualify as an underground storage tank under WAC 173-360. If so, notification to Ecology is required. This has not yet been done.	WAC 173-360	No formal documentation. (Informal discussions have been held.)
Applicability of interim status filings *RL Program(s):* *Technical Management*	Some questions have been raised pertaining to how much, if any, of the sites listed in the Thermal, Physical/Chemical, and Biological Treatment Test Facilities Part A, Form 3 filings made in 1988 are considered to be under interim status. Waste management activities have not taken place under these Form 3s. Facilities and the filings in which they are named include 324 (Thermal, P/C, Biological), 325 (Thermal, P/C, Biological), 331 (Thermal, Biological), 116-B-6-1 Crib (Thermal), and the 600 Area ISV Test Site (Thermal).	WAC 173-303-805	Letter, to EPA and Ecology, "Research, Development, and Demonstration Permitting Strategy," dated October 29, 1993. TPA change requests M-20-94-08 and M-20-94-09, approved December 1994

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENTS:	DOCUMENTATION TO/FROM REGULATORS:
RCRA training *RL Program(s): Technical Management*	The Hanford Facility Permit, Condition II.C.2, requires training for all Hanford facility personnel within six months of hire. This has been interpreted to apply retroactively to all PNL staff. Training has not yet been performed. This item was not included in the annual report of Permit Noncompliance for 1994.	WAC 173-303-810(2)	No formal documentation
Interim Status Requirements for Land Based Units Undergoing Closure *RL Program(s): Env. Restoration*	1. Provisions of protective cover for surface impoundment dike is required at: • 100-D Ponds 2. Weekly inspections of surface impoundment dikes are required at: • 100-D Ponds • 216-A-29 Ditch • 216-S-10 Pond & Ditch • 216-B-3 Pond • 1324-N Surface Impoundment • 1324-NA Percolation Pond 3. Run-on/run-off control system is required at: • 216-A-37-1 Crib • 216-A-10 Crib • 216-A-36B Crib • 216-U-12 Crib • Non-radioactive Dangerous Waste Landfill (NRDWL) • 1301-N Liquid Waste Disposal Facility • 1325-N Liquid Waste Disposal Facility 4. Barriers for TSD access control are required at: • 216-A-29 Ditch 5. Inspection plans and records required at: • Hexone Tanks 6. Groundwater monitoring network required at: • 216-A-37-1 Crib	1. 40 CFR 265.223 Unit is in closure mode consistent with compliance order (TPA) 2. 40 CFR 265.226(a)(2) Units are in closure mode consistent with TPA 3. 40 CFR 265.301(f-h) Unit design precludes contact with liquid from precipitation during non-operational phase 4. WAC-173-303-310(2)(c) Stabilization and backfilling provides barrier 5. WAC-173-303-202 Weekly inspections are consistent with closure of tanks pursuant to TPA 6. 40 CFR 265, Subpart F Technical evaluation of existing monitoring program is necessary to define action plan	

†PUREX UMM tentative agreements or strategies developed.

Exhibit I - Response to Silver Letter
SUMMARY OF NON-PERMITTED POTENTIAL TSD FACILITIES

CONDITION NAME	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S)	DOCUMENTATION TO/FROM REGULATORS
CROSSCUTTING			
Inactive Facilities *RL Programs:* *TWRS* *Waste Management* *Facility Transition* *Env. Restoration*	Inactive facilities may contain hazardous substances. Such facilities include, but are not limited to: • REDOX • Reactor Buildings • U Plant • 231-Z 231-Z contains residual plutonium and might contain residual hazardous materials. The building was transferred from PNL to WHC and ICF-KH in 1994. Currently, landlord (ICF-KH) is responsible for the majority of the facility, while PFP is responsible for any residual plutonium in Cells, 3, 4, 5, 6A, and 6B. • TRUSAF Cells	WAC 173-303-016(3) Inactive facilities being addressed as past practice units	Tentative agreement on facility transition Tri-Party Agreement Negotiations, January 1995, Section 1- of the TPA Action Plan
Inadequately Characterized Materials in Storage *RL Programs:* *TWRS* *Env. Restoration*	Miscellaneous materials are stored and are being evaluated to determine which items are still usable. Remaining materials will be characterized and shipped to the appropriate facility for disposal. Such facilities include: • Room 226 of Building 2101M • 1706-KE; Inventory of high rad. potentially haz. waste: 1) 5-Gallon painted drum, contains 3 mason jars of N-Reactor crud, dry sludge 2) 5-Gallon painted drum, contains 1 mason jar of N-Reactor crud, dry sludge 3) 6" X 12" cask, contents unknown; 5 R on contact 4) 6" X 10" cask, contents unknown; 5 R on contact 5) 5-Gallon painted bucket, contents unknown; 75 R on contact 6) 12" X 24" cask contents screen in plastic bag; 5 R on contact 7) 6" X 12" cask, contents unknown; 1110 mr/hr 8) Plastic jar, half-full, DRIRITE, contains filter tape inside Petri dish; 15 mr/hr 9) Plastic jar, half-full, DRIRITE, contains filter tape inside Petri dish; 45 mr/hr 10) Plastic jar, half-full, DRIRITE, contains filter tape inside Petri dish; 20 mr/hr 11) Strong tight lard can, contents unknown 12) Pipe containing lead inside 10 ml plastic bags; 50 lbs 13) 3 Lead windows 14) 6" X 10" cask, contents unknown	WAC 173-303-016(3)	No formal documentation.
Procedural closure of TSD Units *RL Programs:* *TWRS* *Waste Management* *Facility Transition*	Various TSD Units had Part A, Form 3s submitted to Ecology in anticipation of the unit treating, storing, or disposing of dangerous waste. If it is determined that no hazardous waste activities were performed at these units, they will be procedurally closed under the TPA (Action Plan, Section 6.3.3). Currently, these units are not meeting various interim status standards (See Interim Status Closure Condition): • 2727-WA • 437 (MASF) • 1706-KE	WAC 173-303-805(3) Need concurrence with regulators that these units are not subject to interim status standards.	No formal documentation

CONDITION NAME	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION	REGULATORY STATUS AND APPLICABLE REQUIREMENTS	DOCUMENTATION SUPPORTING REGULATORY
FACILITY-SPECIFIC			
PFP Applicability of RCRA to SNM *RL Program(s):* *Facility Transition*	Plutonium-bearing materials in storage and in process at PFP contain hazardous constituents could become subject to RCRA regulation. No RCRA permits are in place for storage and/or treatment of these materials.	42 USC 2011 (AEA); RCRA; WAC 173-303	Verbal notification made informally by RL.
TWRS Nonpermitted Potential TSD Facilities *RL Program(s):* *TWRS*	1) Mixed Waste in SSTs @ S, SX, T, TX, TY, U Farms (200-W Area). Vertical Storage Units (VSU): 52 total, used for storing equipment from the single shell tanks or used in operations. No radiation contamination at the VSU surface in S Farm but conditions unverified at other farms. Dose rates are expected to be high within the VSUs because units were intended for shielded storage of highly contaminated equipment. Use of VSUs cannot be verified from documentation. Last use of VSUs was probably in the mid-80s based on staff interviews.	WAC 173-303-200; WAC 173-303-280 Contaminated equipment will be managed in accordance with contaminated equipment policy. The empty VSUs will be controlled and closed with the SST operable unit.	No formal documentation.
TWRS Nonpermitted Potential TSD Facilities (cont.)	2) TRU waste with unknown hazardous component at 209E Building (200-E Area). TWRS Waste Operations 90-Day storage on front side of building. Backside of building contains the former PNL Critical Mass Lab. Contains process equipment abandoned in place with unknown waste residue. Also contains 422g of plutonium and 15g of residual depleted uranium. No waste has been stored in the area since WHC assumed responsibility in 1991. Highly radioactively contaminated.	WAC 173-303-016; WAC 173-303-200; WAC 173-303-280 This structure will be closed under the auspices of Section 14 of the TPA Action Plan and the contaminated equipment policy.	No formal documentation.
TWRS Nonpermitted Potential TSD Facilities (cont.)	3) Mixed waste at 242S Evaporator (200-W Area). 242S Evaporator contains process waste and contaminated evaporator equipment; uninventoried and won't be inventoried for ALARA reasons; highly radioactively contaminated. The 242S Evaporator was on the original Decontamination and Decommissioning list; last used to process uranium/ nitric acid recovered from U-14 ditch, 8/6/86.	WAC 173-303-200; WAC 173-303-280 This structure will be closed under the auspices of Section 14 of the TPA Action Plan.	No formal documentation.
TWRS Nonpermitted Potential TSD Facilities (cont.)	4) Mixed waste at 242T Evaporator (200-W Area). 242T Evaporator contains process waste and contaminated evaporator equipment; waste was shipped from the evaporator through mid-1982; high rad./high airborne contamination; last used for waste processing in 1976. Waste was shipped from the evaporator to 216-T-19 through mid-1982.	WAC 173-303-200; WAC 173-303-280 This structure will be closed under the auspices of Section 14 of the TPA Action Plan and the contaminated equipment policy.	No formal documentation.
TWRS Nonpermitted Potential TSD Facilities (cont.)	5) Mixed waste in 241-S-302A (200-E Area). 241-S-302A catch tank was in operation from 1949 to 1991 and is in WIDS. This tank is included as an IMUST.	WAC 173-303-200; WAC 173-303-280 Non-TSD IMUSTs covered by TPA as past practice units. Listed in WIDS. Although actively managed after November 1987, Catch Tank 241-S-302A will be closed with the appropriate operable unit in accordance with TPA Milestone M-45, since catch tanks are considered ancillary equipment to the Single-Shell Tank System.	"Engineering Study of 50 Miscellaneous Inactive Underground Radioactive Waste Tanks Located at the Hanford Site, Washington," WHC-SD-EN-ES-040, Rev. 0, Approved for Public Release on 5/18/94.
K BASINS Nonpermitted Potential TSD Facilities *RL Program(s):* *Waste Management*	1) TRU sludge at 105 KE Basin. Waste codes: WT02/D006/D008/D022. Unit status: S02.	WAC 173-303-200; WAC 173-303-280	No formal documentation.
K BASINS Nonpermitted Potential TSD Facilities (cont.)	2) TRU sludge at 105 KW Basin. Waste codes: WT02/D006/D008/D022. Unit status: S02.	WAC 173-303-200; WAC 173-303-280	No formal documentation.

CONDITION NAME	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION	REGULATORY STATUS AND APPLICABLE REQUIREMENTS	DOCUMENTATION TO/FROM REGULATOR
K BASINS Nonpermitted Potential TSD Facilities (cont.)	3) Containerized hydrogen gas (60 ion exchange columns [TRU/LLW]) at 183 KW Chlorine Vault. Waste code: D001. Unit status: S02/T22/T34.	WAC 173-303-200; WAC 173-303-280	No formal documentation.
N REACTOR Nonpermitted Potential TSD Facilities *RL Program(s):* *Env. Restoration*	Sludge accumulated at the Emergency Dump Basin prior to 1987 contains dangerous waste constituents. Sludge at the Fuel Basin may contain dangerous waste.	WAC 173-303-200; WAC 173-303-280 100-Area deactivation proceeding consistent with compliance order (TPA).	TPA Refocusing Package, signed May, 1995.
Nonpermitted Potential TSD Facilities *RL Program(s):* *Facility Transition*	1) Residues from transfer of radioactive liquid wastes from T-Plant and 340 Facility to Tank Farms are present in each of the four 20,000 gallon tank cars located at the TC4 Spur. The heels are expected to contain F001-F005 listed wastes, and D002 and D004-D011 characteristic wastes. Approximately 100 gallons of heel and 1000 gallons of water (added to provide shielding) are in each car. TC4 Rail Spur (200E) rail tank cars: • 10H-18582; 4 R/hr at contact • 10H-18581; 4 R/hr at contact • 10H-18579; 15 R/hr at contact • 10H-18580; 15 R/hr at contact	WAC 173-303-200; WAC 173-303-280 The containers do not meet the regulatory definition of empty and do not qualify for satellite or 90-day accumulation status.	No formal documentation.
Nonpermitted Potential TSD Facilities (cont.)	2) Residues from the transport of nitric acid/uranyl nitrate solutions from UO3 to PUREX are present in each of the three 8,000 gallon tank cars at the PUREX Chemical Spur. The heels (200 - 300 gallons in each tank car) are characteristic wastes. PUREX Chemical Spur (200E) rail tank cars: • 10H-03710 • 10H-18622 • 10H-18623 Low level radioactivity.	WAC 173-303-200; WAC 173-303-280 The containers do not meet the regulatory definition of empty and do not qualify for satellite or 90-day accumulation status.	No formal documentation. †
Nonpermitted Potential TSD Facilities (cont.)	3) Boxes on top of the two flat cars were used to transport equipment from T-Plant to B-Plant, PUREX, and perhaps other locations after fabrication or repair. Some of the equipment may have contaminated the boxes with dangerous waste. It has not been determined if the boxes are waste or usable equipment. 234-5 Rail Lead (200W) rail flat cars: • 10A-19308 • 10A-19370 It has not been determined if the boxes meet the definition of a container or whether they meet the definition of an empty container. The 234-5 Rail Lead is not a permitted TSD unit nor does it have interim status to store dangerous waste.	WAC 173-303-016; WAC 173-303-070	No formal documentation.
Nonpermitted Potential TSD Facilities (cont.)	4) The butt cuts from utility poles removed as part of electrical upgrades in the 300 Area contain treated wood that may be regulated as a dangerous waste: located at 300 Area Construction Laydown Yard (300 Area). The wood has not been designated. Therefore, it has not been determined if the 180 days allowed for management of certain treated wood has been exceeded. The laydown yard is not a permitted TSD nor is it authorized to store dangerous waste under interim status.	WAC 173-303-016; WAC 173-303-070	No formal documentation.
Nonpermitted Potential TSD Facilities (cont.)	5) Cathodic protection equipment left over from Project W-020H contains cupric sulfate (nonradioactive). Waste cupric sulfate designates as a dangerous waste under the Washington State criteria for toxicity. The equipment is located at the Construction Support Electricians Shop (200W) and at 2101M (200E). It has not been determined if the equipment is waste or if it would be designated as a dangerous waste. It does not currently have an intended use but it may be recyclable. The storage locations for this material are not permitted TSD units nor are they authorized to store dangerous waste under interim status.	WAC 173-303-070; WAC 173-303-200; WAC 173-303-280	No formal documentation.

CONDITION NAME	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION	REGULATORY STATUS AND APPLICABLE REQUIREMENTS	DOCUMENTATION TO/FROM REGULATORS
Nonpermitted Potential TSD Facilities (cont.)	6) Scrap lead at 2101M (200E)-- near bottle rock southwest of building. Several small pieces are in an approximately 50 square foot area. The lead may have been placed at the site prior to 1980. It does not appear to have an intended use but may be suitable for recycling. The vicinity where the lead was discovered on May 26, 1995 is not a permitted TSD nor is it authorized to store dangerous waste under interim status.	WAC 173-303	No formal documentation.
B PLANT Nonpermitted Potential TSD Facilities *RL Program(s):* *Facility Transition*	1) The waste stream to the 221-BF Tanks and 221-BB Weir Tanks was the process condensate and steam condensate from the cell 23 concentrator. Listed waste issues with the low level (^{90}Sr 6.4×10^{-05} ci; ^{137}Cs 8.5×10^{-05} ci) waste stream from the processing of SST waste constitute the application of the F001-F005 waste codes. Condensate is currently being stored in the tanks in 221-BF (70,930L), and potentially in 221-BB from a process test run in 1990.	WAC 173-303-200	No formal documentation.
B PLANT Nonpermitted Potential TSD Facilities (cont.)	2) Cell 23 concentrator received low level (^{90}Sr 7.7×10^{-05} ci; ^{137}Cs 3.7×10^{-04} ci) waste from the cell 18 ion exchange column during Cs and Sr processing until 1985. The concentrator then concentrated a waste stream that was primarily steam condensate, and contaminated raw water from cell drainage until 1987. The concentrator operation was ceased prior to 1990. The concentrator contains potential listed waste (7,800L) that was left over from process tests in 1990.	WAC 173-303-200	No formal documentation.
Waste Without Funding *RL Program(s):* *Laboratory Management*	*In LSL II and RTL, over 55 gallons of Ultima Gold liquid rad waste is in storage. It became mixed waste when the State of Washington determined that Ultima Gold is a dangerous waste when discarded.	WAC 173-303-200(1)	No formal documentation.
Waste not characterized *RL Program(s):* *Laboratory Management*	1. Approximately two years ago, materials were removed from a glove box in 325 Building, Room 302 to facilitate the cleaning of the glove box. The glove box was disposed of and never replaced. The materials are no longer needed. 2. Many used HEPA filters are located in the 325 Building basement. Some are currently being sampled and analyzed for designation. A process to sample other, more highly radioactive filters is being developed. *3. Legacy waste containers of well water with a pH of 1 and other containers of unknown material are located in LSL II, Room 1508. No characterization data is immediately available. *4. A 55-gallon drum containing laser dyes in ethylene glycol is located in the cylinder storage room of the RTL 320 Building. Other solvents are thought to have been added to the drum, and characterization is incomplete, making transfer to a TSD impossible. 5. Legacy waste is located in Room 410, 325 Building. This waste needs to be further characterized. 6. In the 331 Building, several bottles of unknowns have been discovered which require characterization. 7. 202 one gallon cans of remote handled TRU are stored in the 327 Building. This waste is currently being characterized for hazardous components. 8. In room 3E of the 324 Building, there is an old glove box that contains sodium that is greater than Category III radioactive waste. Further characterization is needed.	1. WAC 173-303-070 2. WAC 173-303-070; WAC 173-303-200(1) 3. WAC 173-303-070; WAC 173-303-200(2) 4. WAC 173-303-070 5. WAC 173-303-070 6. WAC 173-303-070 7. WAC 173-303-070 8. WAC 173-303-070	No formal documentation.

CONDITION NAME:	DESCRIPTION, LOCATION, QUANTITY, AND RADIOLOGICAL CONDITION:	REGULATORY STATUS AND APPLICABLE REQUIREMENT(S):	DOCUMENTATION TO/FROM REGULATORS:
Highly Radioactive Mixed Wastes in Storage *RL Program(s):* *Laboratory Management*	1. Several megacuries of solid strontium fluoride are stored in the 325 Building hot cells. Options for use offsite and a disposal pathway are both currently being investigated. 2. A highly contaminated lead shipping cask stored in 325 Building does not have a disposal pathway. Several unsuccessful attempts have been made over the years to dispose of it. It must be over packed for disposal and no suitable over pack exists. The cask may be useable as a burial cask at the CWC. 3. Legacy wastes (high levels of Am-241 in nitric acid) are located in glove boxes in Rooms 504, 506, 507 and 604 of the 325 Building. There is no current disposal pathway due to container and shipping problems arising from the high levels of activity. 4. Six TMB-5 containers stored outside the 325 Building are filled with solid waste from the A-Cell cleanout were assayed and determined to be remote handled TRU waste. No SDAR is in place. Each box weighs approximately 4 tons. The waste may be "derived from" listed waste due to handling of TWRS samples in A-Cell. 5. A waste container in Room 504, 325 Building, contains a vial of Am-241 waste that was originally generated in a glove box in a different location. It was wrapped in a lead glove for shielding purposes and placed in the waste container. A mercury filled manometer was later placed in the container. The inner vial has probably been compromised and contamination is assumed to be dispersed throughout the container. 6. Three drums of special nuclear material, some mixed in acid, are stored in Room 525 of the 325 Building.	1. WAC 173-303-016; 10 CFR §35 2. WAC 173-303-200(1) 3. WAC 173-303-200(1); 10 CFR §35 4. WAC 173-303-070; 10 CFR §35 5. WAC 173-303-070; WAC 173-303-200(1) 6. WAC 173-303-070	No formal documentation.

*PUREX UNM tentative agreements or strategies developed.